

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE: Melvin Williams, Jr.

Case No. 18-30625

Debtor

Chapter 13

DEBTOR'S MOTION TO SELL REAL PROPERTY

COMES NOW, Melvin Williams, Jr. ("Debtor"), and respectfully makes as follows:

1. This action is brought by Plaintiff, Melvin Williams, Jr., Debtor
2. The Court has exclusive jurisdiction over the property in question under 28 U.S.C. §1334. This is a core matter.
3. The Debtor has filed for relief under Chapter 13 on February 9, 2018.
4. At the time of filing the debtor owned real estate located at 2220 Venable Street, Richmond, Va 23223-6463 (hereinafter referred to as "the property")
5. The property in question is presently worth approximately \$152,000.00.
6. Said property is encumbered by a lien to SN Servicing Corp. with an approximate payoff of \$132,288.68.
7. The Debtor has found a buyer, Randall Martinez, willing to purchase the Real Property for a purchase price of \$152,000.00 (contract is attached hereto as Exhibit A) for the property which is more fully described as follows:

All that certain lot, piece or parcel of land with all improvements thereon, lying and being in the city of Richmond, Virginia, on the north line of Venable Street, between Jessamine and Scott Streets (now 22nd Street), beginning at the north line of Venable Street twenty three (23') from the northwestern intersection of Venable and Jessamine Streets; thence running westwardly along the north line of Venable Street and fronting there on twenty three feet (23'); thence extending back at right angles with Venable Street and between parallel lines one hundred fifty seven feet and one half feet (157.5') to an alley ten feet (10') wide.

8. The Debtor believes that after deducting cost of sale and paying off the mortgage, \$5000.00 towards closing costs and realtors' fee the Debtor's share of the proceeds will be less than \$5,000.
9. The Debtors will provide the Trustee with the opportunity to examine the settlement statement to determine that the funds that will be distributed to the Debtors do not exceed the Debtors' homestead exemption. Upon the Trustee's consent as evidenced by his signature on the Order, the Debtors will submit the Order to the Court for entry without a hearing in this matter.
10. The Debtor will provide the Trustee with the opportunity to examine the settlement statement to determine that the funds that will be distributed to the Debtor do not exceed the Debtor's homestead exemption. Upon the Trustee's consent as evidenced by her signature on the Order, the Debtor will submit the Order to the Court for entry without a hearing in this matter.
11. The proposed sale of the real estate does not prejudice the rights of any party.
WHEREFORE, Debtor prays that this Court enter an Order permitting the sale of the said property with no hearing in this matter upon the consent of the Trustee.

Dated: May 30, 2019

Respectfully Submitted,
Melvin Williams, Jr.

By: /s/Richard S. Clinger
Counsel

Richard S. Clinger VSB #19632
422 East Franklin Street, Suite 101
Richmond, VA 23219
(804) 788-1655
Counsel for Debtor(s)

CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2019, a copy of the foregoing Motion was electronically transmitted and/or mailed to the U.S. Trustee, the standing Chapter 13 Trustee, Daniel E. Joslyn, McCabe, Weisberg & Conway, LLC, 312 Marshall Avenue, #800, Laurel, MD 20707 and to all creditors and parties in interest on the mailing list maintained by the clerk of court, a copy of which is attached.

/s/Richard S. Clinger
Counsel for the Debtor(s)

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE: Melvin Williams, Jr.
xxx-xx-2146

Case No. 18-30625

Address: 10124 Spring Ivy Lane
Mechanicsville, VA 23116

Chapter 13

Debtor

NOTICE OF MOTION

Debtor has filed papers with the Court to request an order to Sell Real Estate.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one)

If you do not want the Court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, within **twenty-one (21) days** from the date of this Notice your or your attorney must:

File with the court, at the address below, a written response for a hearing [or a written response pursuant to Local Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough for the court to receive it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
Eastern District of Virginia
701 East Broad Street, Room 4000
Richmond, Virginia 23219

You must also mail a copy to:

Richard S. Clinger, Esquire
422 East Franklin Street, Suite 101
Richmond, VA 23219

Richard S. Clinger VSB #19632
422 East Franklin Street, Suite 101
Richmond, VA 23219
(804) 788-1655
Counsel for Debtor(s)

- Attend the hearing to be scheduled at a later date. You will receive a separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**
- Attend the hearing on the motion scheduled to be held on *** at United States Bankruptcy Court, Eastern District of Virginia 701 East Broad Street, Room 4000 Richmond, Virginia 23219

If you or your attorney do not take these steps, the Court may decide that you do not oppose the action requested to your claim.

Date: May 30, 2019

/s/Richard S. Clinger

Richard S. Clinger VSB #19632
422 East Franklin Street, Suite 101
Richmond, VA 23219
(804) 788-1655
Counsel for Debtor(s)

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/s/Richard S. Clinger
Counsel for the Debtor(s)

0422-3

C/O Shapiro & Brown, LLP

Case 18-30625-KLP

501 Independence Pkwy

Eastern District of Virginia

Ste 203

Richmond

Chesapeake, VA 23320-5174

Thu May 30 09:24:46 EDT 2019

US Department of Education

BSI Financial Services

P O Box 16448

P.O. Box 517

Saint Paul, MN 55116-0448

Titusville, PA 16354-0517

United States Bankruptcy Court

701 East Broad Street

Richmond, VA 23219-1888

City of Richmond City Hall

Room 109 Delinquent Taxes

900 East Broad Street

Richmond VA 23219-1907

Equifax Credit Information

P.O. Box 740241

Atlanta, GA 30374-0241

Equity Experts

Henrico Federal Credit Union

6632 Telegraph Rd. #339

9401 West Broad Street

Bloomfield Hills, MI 48301-3012

Henrico, VA 23294-5331

Internal Revenue Service

Insolvency Units

P.O. Box 7346

Philadelphia, PA 19101-7346

Kings Charter Homeowners Assc

Melvin Williams, Jr.

c/o HOA Collection Services

10124 Spring Ivy Lane

9407 Kings Charter Drive

Mechanicsville, VA 23116-5144

Mechanicsville, VA 23116-5119

Navient Solutions, LLC. on behalf of

United Student Aid Funds, Inc.

GLHEC and Affiliates

PO BOX 8961

Madison, WI 53708-8961

Navinet

Ocwen Loan Servicing, LLC

P.O. Box 9500

Attn: Bankruptcy Department

Wilkes Barre, PA 18773-9500

PO Box 24605

West Palm Beach, Florida 33416-4605

Ocwen Mortgage

PO BOX 24781

West Palm Beach, FL 33416-4781

Office of the U. S. Attorney

Office of the U. S. Trustee

PRP II Pals Investments Trust

Suntrust Building

701 East Broad Street, Room 4305

c/o McCabe, Weisberg & Conway, LLC

919 East Main Street, Suite 1900

Richmond, VA 23219-1885

312 Marshall Avenue, Suite 800

Richmond, VA 23219-4622

Laurel, MD 20707-4808

Realty Industrial Loan Corp

Richard S. Clinger VSB

210 East Main Street

Richard S. Clinger

Richmond, VA 23219-3740

422 East Franklin Street, Suite 101

Richmond City

c/o Tacs

P.O. Box 31800

Henrico, VA 23294-1800

(p)SN SERVICING CORPORATION

U.S. BANK TRUST NATIONAL ASSOCIATION, AS TRU

323 FIFTH ST

c/o McCabe, Weisberg & Conway, LLC

EUREKA CA 95501-0305

312 Marshall Avenue, Suite 800

U.S. Bank Trust National Association, as Tru

c/o BSI Financial Services

1425 Greenway Drive, Ste. 400

Irving, TX 75038-2480

US Bank Trust National Association

US Department of Education

US Department of Education

SN Servicing Corporation

61 Forsyth St SW

PO Box 16448

323 Fifth St

Ste 19740

St. Paul, MN 55116-0448

Eureka, CA 95501-0305

Atlanta, GA 30303-8931

Suzanne E. Wade

P.O. Box 1780

Richmond, VA 23218-1780

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

SN Servicing Corp.

323 5th St.

Eureka, CA 95501-0000

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) US Bank Trust National Association, as Tr

(u)PRP II Pals Investments Trust

(u)U.S. BANK TRUST NATIONAL ASSOCIATION, AS T

(d)Melvin Williams Jr.

10124 Spring Ivy Lane

Mechanicsville, VA 23116-5144

End of Label Matrix

Mailable recipients 33

Bypassed recipients 4

Total 37